SIERRA CLUB · New England Chapter
3 JOY STREET, ROOM 12, BOSTON, MASSACHUSETTS, 02108 · 617-227-5339

58068

August 2, 1983
Mr. William Ruckelshaus, Administrator
U.S. Environmental Protection Agency
Washington, DC

Dear Mr. Ruckelshaus:

I would like to thank you very much for this opportunity for environmental leaders to meet with you today here in Boston. I am very encouraged by EPA's revised approach to communication with public interest groups.

In case there is not time to raise all our of major concerns during the question and answer period this afternoon, I wanted to express some of these concerns to you in writing. I was fortunate enough to hear your remarks to the Energy and Environment Committee of the National Governors' Association meeting yesterday in Portland, and some of the concerns raised below relate to yesterday's proceedings.

The first, however, relates to yesterday's announcement of the $3.4 million study of chemical contamination in New Bedford.

1. New Bedford PCB Study/Cleanup. We are pleased that EPA is giving serious attention and funding to the New Bedford PCB problem. However, the Sierra Club submitted comments last spring on the draft Remedial Action Management Plan for New Bedford which stated our belief that extensive information is already available for at least some of the contaminated areas in that city. We are now wondering whether the New Bedford area, already recognized as one of the nation's most serious hazardous waste sites for many years, is now being designated as a perpetual study site?

We do not understand, for example, why the proposal includes nine more months of study of the Acushnet River estuary. Specific locations of high PCB concentrations have already been identified. We believe that formulation of clean-up alternatives for this area could be accomplished on the basis of present knowledge in a shorter time period (one or two months), and that the clean-up could take place this year. Why is nine more months of study of an already well-studied area necessary?

Extensive information is also available on other contaminated areas, such as the municipal landfill, the sewer system, and the treatment plant, which would enable EPA to move on to proposal of cleanup alternatives.

2. Acid rain. The recent report of the National Academy of Sciences stated that there is a linear relationship between amount of sulfur emissions and amount of acid rain. The White House panel of scientists concluded about the same time that immediate action is needed lest environmental damage reach the point of irreversibility. The scientific community has also linked a 50% reduction in emissions with the achievement of a target deposition rate of no more than 20 kilograms/hectare in the Northeast, a rate at which acid rain damage is not expected to increase. Given these

findings, what is now holding EPA back from endorsing immediate action to reduce emissions by 50%?

I believe that you stated at the NGA meeting yesterday that "we have time" to look at this problem. In view of the results of lake and pond monitoring programs now going on in Massachusetts and other New England states, we would like to emphasize that we don't have much time.

Hurley hearing

3. Air Toxics Standards. You stated yesterday that the federal requirements relating to air toxics standards may have to be reexamined in the light of scientific evidence that there is for some substances no minimum threshold of exposure below which health effects do not occur.
In what way do you see the federal requirements being changed that will still guarantee protection of public health?

Hurley hearing

4. Carbon Monoxide Standard. You also referred at the NGA meeting to the federal ambient air quality standard for carbon monoxide, indicating that there is a discrepancy between the ambient standard, technological requirements, and pollutant levels which areas such as Los Angeles, Denver, and Phoenix can be expected to achieve. Are you considering recommending a change in the federal carbon monoxide standard, and if so, how would you insure that the public would suffer no adverse health effects, given the rather well-documented scientific knowledge in this area?

Port Money

5. EPA Budget, particularly State Grants. You stated at the NGA meeting that the question of "who pays" for environmental control programs -- the states or the federal government -- can be figured out after there has been further coordination and definition of the federal and state role in EPA projects. With this in mind, we raise the following concern.
It was extremely disappointing to learn that, despite the fact that EPA has delegated programs to many states during the last few years, your budget request to Congress did not even restore funding of state grants to 1982 levels, much less 1981. Particularly since many states are facing severe budget cuts and restrictions and cannot assume increased financial burdens, we are concerned that the failure to restore the 1981 funding levels to state grants represents a de facto abandonment of the goals of the federal programs which are being delegated.

We are also generally concerned that your belief that EPA could not effectively use funding at 1981 levels (as approved by the House of Representatives) in the next fiscal year clearly testifies to the alarming decline of the agency under your predecessor. How soon can EPA recover?

Finally, you stated your intention yesterday to follow a policy of "trusting states" more. While there are many things to be said in favor of such an approach, we hope that this policy will include a clear recognition that it is ultimately EPA's responsibility to see that the goals of the federal environmental laws are achieved.

I appreciate your consideration of these concerns, and once again, thank you for your willingness to meet with us today.

Best wishes for success in your attempts to restore the EPA to its former role.

Sincerely yours,

Priscilla A. Chapman

Priscilla A. Chapman
Executive Director, New England Sierra Club

cc: Mr. Michael Deland, Region 1 Administrator

New England Sierran

Effects of Carbon Monoxide Levels

Below are excerpts from a letter written to Senator Stafford, Chair of the Senate Environment and Public Works Committee, from representatives of seven national health organizations. The letter urges Stafford to oppose raising the standard for carbon monoxide emissions.

Dear Senator Stafford:

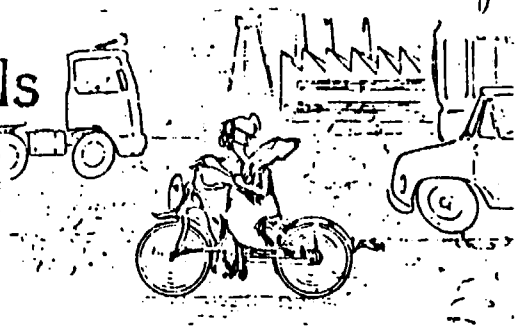
The Senate Committee on Environment and Public Works will be considering an amendment to the Clean Air Act which would relax the auto emission standard for carbon monoxide (CO) from 3.4 grams per mile (gpm) to 7.0 gpm. We are concerned that this amendment will significantly interfere with the attainment of the National Ambient Air Quality Standard (NAAQS) for CO.

Emissions from motor vehicles constitute the largest source category for ambient concentrations of CO–83%. An important characteristic of CO is that it has neither color nor odor and it is not a primary irritant to the mucous membranes or the epithelial lining of the respiratory tract. Hence, its presence and deleterious effects in ambient air are not readily perceived by exposed persons.

The mechanisms of CO toxicity are better understood than those of any pollutants produced by combustion of fossil fuels. The effects of CO stem primarily from its affinity with the blood's oxygen-carrying protein, hemoglobin (Blood hemoglobin is 200 times more likely to bond with CO than oxygen.) When CO and hemoglobin combine, carboxyhemoglobin (COHb) is produced in the blood. Significant amounts of inhaled CO can raise COHb levels dramatically causing deficient oxygenation of the blood.

This can result in early onset or aggravation of angina pectoris. In addition, symptoms triggered by increased COHb levels may be the first in a series of progressively more serious symptoms that accompany coronary insufficiency, myocardial infarcation (heart attack) and other cardiovascular diseases. The population at risk to adverse effects from exposure to CO (depending on their sensitivity to CO and the amount by which the CO level exceeds the NAAQS) include persons with cardiovascular or peripheral vascular disease and pregnant women.

Projections for future CO air quality, demonstrate that the potential exists to virtually eliminate the CO problem over the next decade if the current regulatory structure is left in place. A relaxation of the auto emission standard for CO can have a negative impact on the achievement of this goal.



The National Commission on Air Quality recommendation to relax the CO auto emission standard from 3.4 gpm to 7.0 gpm, according to their projections will not interfere with attainment of the CO ambient air quality standard. However, this recommendation is based on the following assumptions: 1) mandatory inspection and maintenance (I/M) programs remain in place; 2) a low growth economy persists; and 3) strict controls on light and heavy duty trucks.

We question the validity of these assumptions. For example, there are recommendations that mandatory I/M programs no longer be required under the Act. Should I/M not be implemented, violations of the ambient air quality standard are projected to double between 1984 and 1990.

We urge your support of the current auto emission standard for CO of 3.4 gpm. If we continue the current regulatory program including the auto emission standards, we can reasonably project attainment of the ambient air quality standard for CO by the end of this decade.